



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*United States District Courthouse  
300 Quarropas Street  
White Plains, New York 10601*

March 3, 2021

By ECF

The Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Application granted. Speedy Trial Time excluded until March 5, 2021.

**SO ORDERED.**

NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE  
Dated: New York, New York

March 3, 2021

Re: ***United States v. Tsani Russell, 19 Cr. 554 (NRB)***

Dear Judge Buchwald:

The parties were last before the Court for a December 21, 2020 status conference in this matter, at which time the Court entered an order under the Speedy Trial Act excluding time through February 24, 2021, when the parties were to appear for another status conference. That status conference was subsequently adjourned to March 5, 2021.

The Government respectfully requests that time be excluded under the Speedy Trial Act from the signing of this requested order through March 5, 2021, pursuant to Title 18, United States Code, Section 3161(h)(7)(A). During this time, the Government expects that the parties will continue to explore a pretrial resolution. The Government submits that the ends of justice served by the granting of this continuance outweigh the best interests of the public and the defendant in a speedy trial. Counsel for the defendant, David A. Ruhnke, has consented to the exclusion of this time, on the defendant's behalf.

Thank you for your consideration.

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney

By:/s/ Jeffrey C. Coffman

Jeffrey C. Coffman  
Assistant United States Attorney  
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cc: David A. Ruhnke, Esq.  
Diane Ferrone, Esq.  
by ECF